



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

# Memorandum

Subject: **INFORMATION**: AIR-200 Policy Memorandum  
#99-01, Guidance relating to Title 14 Code of Federal  
Regulations (14 CFR) part 21, Certification  
Procedures for Products and Parts (part 21),  
Section 21.603, TSO Marking and Privileges

Date: January 7, 1999

From: Acting Manager, Production and Airworthiness  
Certification Division, AIR-200

Reply to  
Attn. of:

To: All Aircraft Certification Offices  
All Manufacturing Inspection Offices  
All Manufacturing Inspection District/Satellite Offices  
All Flight Standards District Offices

This policy memorandum provides guidance to all Aviation Safety Inspectors and Aviation Safety Engineers relating to 14 CFR part 21, Certification Procedures for Products and Parts (part 21), section 21.603.

Section 21.603(a), states in part "...no person may identify an article with a TSO marking unless that person holds a TSO authorization and the article meets applicable TSO performance standards." The intent of section 21.603 is to address the identification of an article with its **original Technical Standard Order (TSO) identification marking as required by section 21.607(d) at the time of manufacture.**

Section 21.603 does not prohibit a certificated person from **modifying or replacing the original TSO identification marking** in accordance with the TSO authorization holders instructions (e.g., service letters, service bulletins, airworthiness directives, etc.) resulting from a **FAA-approved design change.**

**Note: A certificated person is defined as those authorized under 14 CFR section 43.3, Persons authorized to perform maintenance, preventive maintenance, rebuilding, and alterations.**

The following guidance applies to the incorporation of design changes into TSO articles that have left the manufacturers quality control system.

There are instances when the holder of TSO authorization, or letter of TSO design approval, changes a design and provides data so that these changes may be incorporated into articles in service, through alteration. Service bulletins, service letters, and airworthiness directives are common nomenclature for these type of data, but the data may be transmitted in any appropriate form. Regardless of whether the change is major or minor, as defined in section 21.611, it may be necessary and/or appropriate to reidentify the article.

This reidentification procedure must be part of the FAA-approved data for the entire alteration. The identification markings must comply with the requirements of section 21.607 and the applicable TSO. Some of the reidentification methods expected are making additional marks, making new marks and obliterating the old, installing a new dataplate or label provided by the TSO authorization holder or a combination thereof. Consideration should be given to minimizing confusion as to the status of the article and maximizing traceability to the maintenance and alteration records.

Design changes introduced by persons other than the TSO authorization holder are permissible under section 21.611(c). FAA Order 8150.1A, Technical Standard Order Procedures, paragraph 21, addresses the identification/markings requirements of TSO articles which are modified by persons other than the TSO manufacturer.

This memorandum has been coordinated with the Aircraft Certification Service, Engineering Division (AIR-100) and the Flight Standards Service, Continuous Airworthiness Maintenance Division (AFS-300). If there are any questions, please contact a member of the Production and Airworthiness Certification Division (AIR-200) at (202) 267-8361.

/s/

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